



DEMOCRATIC NATIONAL COMMITTEE

Donald L. Fowler, *National Chair* • Christopher J. Dodd, *General Chair*

September 26, 1996

SEP 26 1 19 PM '96

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COMMISSION
OFFICE OF GENERAL
COUNSEL

By Hand

Office of the General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Attention: Andre Pineda

Re: MUR 4407

Dear Mr. Pineda:

On August 16, 1996, respondent Democratic National Committee submitted its response to the complaint filed in the above-captioned MUR.

In that response, we contend that the complaint's allegations of coordination of DNC legislative issue advertising between the DNC and the party's candidates are legally irrelevant. We also contend that, even if such allegations were relevant, there is no valid evidence in the complaint supporting these allegations. With respect to the latter point, we noted that the only evidence cited anywhere in the complaint consists of excerpts from the book entitled The Choice, by Bob Woodward. We argued that, this book is not a factual or accurate report of the events and conversations it recounts and, in particular, that the specific excerpts from The Choice on which the complaint relies are neither well-documented nor "substantial" within the meaning of Agenda Document 1979-29, approved by the Commission on November 15, 1979.

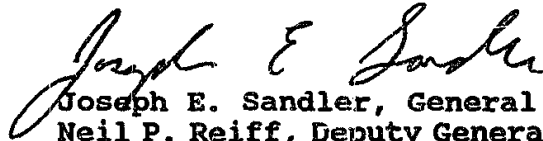
To support that proposition further, we are hereby submitting the Declaration of Robert D. Squier, president of the media firm that produced the television advertisements to which the complaint apparently refers. The Squier Declaration confirms that many of the excerpts from the book, specifically the excerpts on which the complaint relies, are inaccurate. In particular, the Squier Declaration specifically asserts that, to the extent that the book suggests that the President controlled and directed the creation and placement of DNC advertising, "it is factually untrue".

We request that this Declaration be treated as a supplement to

our August 16 response and considered by the Commission as part of that response.

Thank you for your time and attention to this.

Sincerely yours,

A handwritten signature in cursive script, reading "Joseph E. Sandler".

Joseph E. Sandler, General Counsel
Neil P. Reiff, Deputy General Counsel
Attorneys for Respondents Democratic
National Committee and R. Scott
Pastrick, as Treasurer